

**UNITED STATES DISTRICT COURT DISTRICT  
OF NEW JERSEY**

EMQORE ENVESECURE PRIVATE CAPITAL TRUST,

Plaintiff,

Civil Action No.: 2:20-cv-07324-  
KM-JBC

v.

BHAVDEEP SINGH;  
MALVINDER MOHAN SINGH;  
SHIVINDER MOHAN SINGH;  
SHAKEEB ALAM;  
FORTIS HEALTHCARE LIMITED;  
EAST BRIDGE CAPITAL MASTER FUND LTD.;  
EAST BRIDGE CAPITAL MASTER FUND I LTD.;  
EAST BRIDGE CAPITAL MANAGEMENT LP;  
IHH HEALTHCARE BERHAD;  
KHAZANAH NASIONAL BERHAD;  
RELIGARE ENTERPRISES LIMITED;  
RELIGARE FINVEST LIMITED;  
RELIGARE ENTERPRISES LTD  
CARE HEALTH INSURANCE LIMITED;  
RELIGARE BROKING LIMITED;  
DBS BANK;  
SRL LIMITED  
NEW YORK LIFE INVESTMENT MANAGEMENT, LLC;  
INTERNATIONAL FINANCE CORPORATION;  
SIGULER GUFF & COMPANY, LP;  
BAY CAPITAL ADVISORS PRIVATE LIMITED;  
ARES MANAGEMENT CORPORATION;  
MITSUI & CO. LTD.  
MITSUI & CO (USA) INC.;  
ARES MANAGEMENT CORPORATION  
ARES SSG;  
SIDDHARTH DINESH MEHTA;  
SHAM MAHESHWARI;  
ABC CORP. (1 – 10) (fictitious entities), and  
JOHN AND JANE DOES 1-10 (fictitious entities)

Hon. Kevin McNulty, U.S.D.J.  
Hon. James B. Clark, U.S.M.J

**DECLARATION OF  
ALFRED V. GELLENE**

Defendants.

FORTIS HEALTHCARE HOLDINGS LIMITED;  
NORTHERN TK VENTURE PTE. LTD.;

BESTEST DEVELOPERS PRIVATE LIMITED;  
RELIGARE HEALTH TRUST;  
SGGD PROJECTS DEVELOPMENT PRIVATE LIMITED;  
DAIICHI SANKYO, INC.  
RANCHEM PRIVATE LIMITED;  
RASHMI SALUJA  
RAVI RAJAGOPAL;  
SECURITIES EXCHANGE BOARD OF INDIA  
RESERVE BANK OF INDIA  
STATE BANK OF INDIA  
INDIA HORIZONS FUND LIMITED;  
RESILIENT INDIA GROWTH FUND;  
RHC HOLDINGS PRIVATE LIMITED;  
RELIGARE HEALTH TRUST;  
M.V. DOSHI  
LKP FINANCE LTD.  
SS KOTHARI MEHTA & COMPANY and  
IDBI TRUSTEESHIP SERVICES LIMITED  
GURINDER SINGH DHILLON

Non-Party Defendants

**DECLARATION IN SUPPORT OF MOTION TO BE RELIEVED AS COUNSEL**

Alfred V. Gellene hereby declares as follows:

1. I am the attorney of record for the plaintiff in this matter, Emqore Envesecure Private Capital Trust, hereinafter referred to as "Emqore". I am making this application to be relieved as counsel for the plaintiff due to my suspension from the practice of law effective April 11, 2022. The suspension is for three months. Reinstatement is not automatic and must be applied for.
2. As a result of my suspension, NJ Rule of Court 1:20-20 required me to notify the plaintiff via letter of my suspension and advise it to obtain alternative counsel promptly. I mailed a letter to that effect to the address of record of Emqore and emailed a copy of that letter to corporate counsel on March 19, 2022. A copy of my letter is attached hereto as Exhibit "A".

3. I was also required to notify the court in which any matter was pending, which I did in this matter by advising both Hon. Kevin McNulty, United States District Judge, and to Hon. James B. Clark, III, U.S. Magistrate Judge, to whom this case is assigned, Copies of those letters are attached hereto as Exhibit "B".
4. Rule 1:20-20 requires that 20 days after notifying my clients of my suspension for me to move before all courts in which I have active matters to be relieved of counsel.
5. Wherefore, I request that the court relieve me as counsel for Emqore as soon as possible.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 11, 2022

By: /s/Alfred V. Gellene  
ALFRED V. GELLENE

**EXHIBIT 'A'**

ALFRED V. GELLENE, ESQ.

41 Vreeland Ave.

Suite 33

Totowa, NJ 07512

973-837-8002

973-425-5244 fax

[algellene@gmail.com](mailto:algellene@gmail.com)

March 19, 2022

**Via Email and Regular Mail**

Emqore Envesecure Private Capital Trust

1712 Pioneer Avenue

Suite 387

Cheyenne, Wyoming 82001

Attention: Kumar.

**Re: Emqore Envesecure Private Capital Trust v. Bhavdeep Singh, et al  
Case No. 20-cv-7324 (KM)(JBC)**

Dear Mr. Kumar:

I regret to inform you that I can no longer represent you with regard to the above matters. Effective April 11, 2022, I have been suspended from the practice of law. You should seek legal advice elsewhere and obtain another attorney to represent you in this case. Under the rules governing suspended attorneys, I am not permitted to make any recommendation as to whom you might contact to represent you.

I will cooperate in transferring your files to your new attorney and provide him or her with a Substitution of Attorney form to expedite his or her participation in this case on your behalf. You should promptly have that attorney substitute himself or herself for me in this case.

If you have any questions regarding this letter, please do not hesitate to call.

Thank you for your attention in this matter.

Very truly yours,

**/s/Alfred V. Gellene**

ALFRED V. GELLENE

**EXHIBIT 'B'**

ALFRED V. GELLENE, ESQ.

41 Vreeland Ave.

Suite 33

Totowa, NJ 07512

973-837-8002

973-425-5244 fax

[algellene@gmail.com](mailto:algellene@gmail.com)

March 21, 2022

Hon. James B. Clark, III

U.S. Magistrate Judge

Martin Luther King Building & U.S. Courthouse

50 Walnut Street,

Room 4015

Newark, NJ 07101

**Re: Emqore Evensecure Private Capital Trust v.  
Singh et al., Civ. No. 20-7324 (KM)(JBC)**

Dear Judge Clark:

Attached please find a copy of a letter I have sent to Judge McNulty today regarding my prospective suspension from the practice of law effective April 11, 2022.

Thank you for your attention in this matter.

Respectfully yours,

**/s/Alfred V. Gellene**

ALFRED V. GELLENE

Enclosure

c.c. Attached Service List (via ECF)

AVG/stp

ALFRED V. GELLENE, ESQ.  
41 Vreeland Ave.  
Suite 33  
Totowa, NJ 07512  
973-837-8002  
973-425-5244 fax  
[algellene@gmail.com](mailto:algellene@gmail.com)

March 22, 2022

Hon. Kevin McNulty  
United States District Judge  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street,  
Room 4015  
Newark, NJ 07101

**Re: Emqore Evensecure Private Capital Trust v.  
Singh et al., Civ. No. 20-7324 (KM)(JBC)**

Dear Judge McNulty:

I represent the Plaintiff in the above matter, Emqore Envesecure Private Capital Trust. I am obligated to advise you that I have been temporarily suspended from the practice of law effective April 11, 2022. I have advised my client of this fact and advised it to seek new counsel as soon as possible. Emqore Envesecure Private Capital Trust's mailing address is 1712 Pioneer Avenue, Suite 387, Cheyenne, Wyoming 82001. The contact email address I have been using is email address is **attorneykumar@yahoo.com**.

Thank you for your attention in this matter.

Respectfully yours,

**/s/Alfred V. Gellene**  
ALFRED V. GELLENE

c.c. Hon. James B. Clark, III , U.S. Magistrate Judge  
Attached Service List (via email)  
Emqore Envesecure Private Capital Trust  
AVG/stp